

In the Drawings:

Please enter the attached replacement sheet for FIG. 3.

REMARKS

A replacement sheet for FIG. 3 has been attached. The replacement sheet for FIG. 3 does not contain any new matter.

The Examiner rejected claims 1-4 and 8 under 35 U.S.C. §102(b) as allegedly being anticipated by Robinson et al.

The Examiner rejected claims 5-6 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Moran et al., US 6,326,946.

The Examiner rejected claims 7 and 9-10 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Musk et al., US 6,148,260.

The Examiner rejected claims 11, 13-15, and 18-21 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Moran et al., US 6,326,946 and Thompson et al., US 5,986,401.

The Examiner rejected claims 12 and 16-17 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Moran et al., US 6,326,946 and Thompson et al., US 5,986,401 and further in view of Musk et al., US 6,148,260.

Applicants respectfully traverse the §102 and §103 rejections with the following arguments.

35 U.S.C. §102(b)

The Examiner rejected claims 1-4 and 8 under 35 U.S.C. §102(b) as allegedly being anticipated by Robinson et al.

Applicants respectfully contend that Robinson does not anticipate claim 1, because Robinson does not teach each and every feature of claim 1.

As a first example of why Robinson does not teach each and every feature of claim 1, Robinson does not teach the feature: “determining absolute coordinates of the referenced item”. Instead, Robinson teaches “the co-ordinates of the **interactor**” (see Robinson, page 3, line 14) which is not the coordinates of the referenced item in the electronic document, as required by claim 1. See also, Robinson, page 2, Section 2: “The first problem is to associate **interactions** with locations on printed documents” (emphasis added).

As a second example of why Robinson does not teach each and every feature of claim 1, Robinson does not teach the feature: “encoding the absolute coordinates in the hyperlink”. The only reference made in Robinson to hyperlinks is in Section 4.1, namely: “it is also possible to mark areas of the document as hyperlinks and to associate interactors with them. This adds code references to the rendering information.” Applicants respectfully contend that the preceding citation in Robinson does not disclose “encoding the absolute coordinates in the hyperlink” as required by claim 1.

In contrast, Applicant recites the following content relating to “encoding the absolute coordinates in the hyperlink” in Applicant’s specification on page 23, lines 10-16:

“In a preferred embodiment, these hyperlinks are defined as "geographic links" (or "geo-links") and comprise the encoded geographic (cartographic) coordinates of the locations referenced in the electronic document (or Web page). These geographic links are defined in the form of an extension of HTML (Hyper-Text Markup Language), with the following syntax:

<geo href= "hyperlink-URL" lat= Latitude lon= Longitude > Location_Name </geo>

This geographic link associates an item related to a location (Location_Name) with the cartographic coordinates (**Latitude** and **Longitude**) of this location. Optionally, the geographic link associates a location (Location_Name) with the Universal Resource Locator ("hyperlink-URL") of another electronic document.”

Based on the preceding arguments, Applicants respectfully maintain that Robinson does not anticipate claim 1, and that claim 1 is in condition for allowance. Since claims 2-4 and 8 depend from claim 1, Applicants contend that claims 2-4 and 8 are likewise in condition for allowance.

35 U.S.C. §103(a) (Claims 11 and 13-15)

The Examiner rejected claims 11 and 13-15 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Moran et al., US 6,326,946 and Thompson et al., US 5,986,401.

Applicants respectfully contend that claim 11 is not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al., because Robinson et al. in view of Moran et al. and Thompson et al. does not teach or suggest each and every feature of claim 11. For example, Robinson et al. in view of Moran et al. and Thompson et al. does not teach or suggest the feature: “within the referenced item, a hyperlink to a physical document; and within the hyperlink, encoded absolute coordinates of the referenced item”.

The only reference made in Robinson to hyperlinks is in Section 4.1, namely: “it is also possible to mark areas of the document as hyperlinks and to associate interactors with them. This adds code references to the rendering information.” Applicants respectfully contend that the preceding citation in Robinson does not disclose “within the referenced item, a hyperlink to a physical document; and within the hyperlink, encoded absolute coordinates of the referenced item” as required by claim 11.

In contrast, Applicant recites the following content relating to “within the referenced item, a hyperlink to a physical document; and within the hyperlink, encoded absolute coordinates of the referenced item” in Applicant’s specification on page 23, lines 10-16:

“In a preferred embodiment, these hyperlinks are defined as "geographic links" (or "geo-links") and comprise the encoded geographic (cartographic) coordinates of the locations referenced in the electronic document (or Web page). These geographic links are defined in the form of an extension of HTML (Hyper-Text Markup Language), with the following syntax:

<geo href= "hyperlink-URL" lat= Latitude lon= Longitude > Location_Name </geo>

This geographic link associates an item related to a location (Location_Name) with the cartographic coordinates (**Latitude** and **Longitude**) of this location. Optionally, the geographic link associates a location (Location_Name) with the Universal Resource Locator ("hyperlink-URL") of another electronic document."

Based on the preceding arguments, Applicants respectfully maintain that claim 11 is not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al., and that claim 11 is in condition for allowance. Since claims 13-15 depend from claim 11, Applicants contend that claims 13-15 are likewise in condition for allowance.

35 U.S.C. §103(a) (Claims 18-21)

The Examiner rejected claims 18-21 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Moran et al., US 6,326,946 and Thompson et al., US 5,986,401.

As a first example of why claim 18 is not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al., Robinson et al. in view of Moran et al. and Thompson et al. does not teach or suggest the feature: “determining absolute coordinates of the referenced item”. Instead, Robinson teaches “the co-ordinates of the **interactor**” (see Robinson, page 3, line 14) which is not the coordinates of the referenced item in the electronic document, as required by claim 1. See also, Robinson, page 2, Section 2: “The first problem is to associate **interactions** with locations on printed documents” (emphasis added)..

As a second example of why claim 18 is not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al., Robinson et al. in view of Moran et al. and Thompson et al. does not teach or suggest the feature: “aligning an opto-touch foil on the physical document”. Although the Examiner alleges that “Moran teaches a touch foil for identifying a location selected by a user's touch “, the preceding alleged disclosure by Moran does not satisfy the optical limitation associated with a opto-touch foil, as required by claim 18.

As a third example of why claim 18 is not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al., Robinson et al. in view of Moran et al. and Thompson et al.

does not teach or suggest the feature: “computing, from the absolute coordinates, foil coordinates on the opto-touch foil corresponding to a position on the physical document”.

Based on the preceding arguments, Applicants respectfully maintain that claim 18 is not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al., and that claim 18 is in condition for allowance. Since claims 19-21 depend from claim 18, Applicants contend that claims 19-21 are likewise in condition for allowance.

35 U.S.C. §103(a) (Claims 12 and 16-17)

The Examiner rejected claims 12 under 35 U.S.C. §103(a) as allegedly being unpatentable over Robinson et al. in view of Moran et al., US 6,326,946 and Thompson et al., US 5,986,401 and further in view of Musk et al., US 6,148,260.


Since claims 12 and 16-17 depend from claim 11, which Applicants have argued *supra* to not be unpatentable over Robinson et al. in view of Moran et al. and Thompson et al. under 35 U.S.C. §103(a), Applicants maintain that claims 12 and 16-17 are likewise not unpatentable over Robinson et al. in view of Moran et al. and Thompson et al. and further in view of Musk et al. under 35 U.S.C. §103(a).

CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account No. 09-0457.

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